

LAW OFFICE OF
ELLEN S. GOLDMAN
LICENSED IN KANSAS AND MISSOURI

January 27, 2021

Cathie Chiccine
Attorney, Office of Regional Counsel
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

Via electronic mail; Chiccine.catherine@epa.gov.

Dear Ms Chiccine:

Mr. Garrison and I received two letters from Mr. Miley requesting information pursuant to CERCLA 104(e) pertaining to the Findett Superfund Site. Pursuant to your email of January 4, 2021, it is understood that one was intended for Findett Real Estate Corporation and one for Mr. Garrison. I have enclosed Mr. Garrison's response to the requested information (11 items) in Enclosure B of the Letter addressed to Findett Real Estate Corporation. (hereinafter "Findett Exhibit B"). The Enclosure B of the Letter to Mr. Garrison are answered in the Findett Exhibit B response since that Enclosure requested similar information. For your reference, the Enclosure B in the George Garrison Letter is responded to as follows;

1. Mr. Garrison does not have requested documents. (See response to question 4 of Findett Exhibit B).
2. Response to this request is covered in the response to 1, 3, 6, and 7 of Findett Exhibit B.
3. Response to this request is covered in the response to Findett Exhibit B question 8. Mr. Garrison does not have responsive documents.
4. Response to this request is covered in the response to Findett Exhibit B question 10.
5. Response to this request is responded to Findett Exhibit B question 10.
6. Response to this request is responded to Findett Exhibit B question 7.

Please let me know if you have any questions.

Sincerely,



1. Identify all legal successors, parent companies, or other affiliated entities of Respondent.

Arch Technology Holdings acquired 100% of the equity of Findett Corporation. The Real Estate was spun out as a separate entity, Findett Real Estate Corporation, which was acquired George E. Garrison for \$150,000. The lenders provided Garrison with the \$150,000 evidenced by a Note from Garrison. Arch Technology, which changed its name to SantoLubes in 2005, paid Garrison rent of \$3,000 a month, which covered the interest on the Note.

In June 2008, the site at 8 Governor was flooded. When operations commenced on the site in April 2009, there was an explosion and fire and the site became unusable as an operating site. Accordingly, in October 2009, SantoLubes acquired Blackman Uhler, a much larger manufacturing business located in Spartanburg, SC and moved its headquarters and operations to Spartanburg, SC.

The lenders to SantoLubes provided Garrison with a new Note for \$150,000 and Garrison repaid the original Note. Findett Real Corporation was dissolved and was replaced with Findett Real Estate LLC, a Missouri LLC. Garrison continued to meet the obligations of Findett RE LLC until December 2012 when SantoLubes failed a bank covenant. The lender, now Bank of Montreal, took SantoLubes into its Workout Group and forced the sale of one of its subsidiaries, Envincio. SantoLubes sold Envincio in April 2014. Garrison received some proceeds from the sale and repaid the \$150,000 Note to BMO. The Workout Group forced Garrison to take a reduction in salary of 40% and Garrison could no longer meet the Findett RE capital calls from the OU3 Group, the offsite group, or the OU1 and OU2 calls. SantoLubes, therefore, began paying the Operating Unit capital calls.

SantoLubes continued to fund the expenses of the various Operating Units associated with 8 Governor Drive through January 2020. They also paid the Real Estate Taxes for 8 Governor Dr. On January 31, 2020, the majority owner and lender to SantoLubes, Vantage Labs, terminated George E. Garrison for cause. Vantage bought all of Garrison's shares in SantoLubes and seized all the records and emails of SantoLubes.

2003 Findett Corporation 2003 Arch Technology Corporation 2003 Findett Real Estate Corporation 2005 SantoLubes LLC 2009 Findett Real Estate LLC October 2009 SantoLubes LLC acquires Blackman Uhler and moves its headquarters and operations to Spartanburg, SC. All debt refinanced with BMO. December 2012 BMO moves SantoLubes into its Workout Group, Garrison's compensation is cut 40%, and SantoLubes begins paying for the Pump and Treat at 8 Governor, the Operating Units Capital calls, and the real estate taxes. April 2014 sale of Envincio is completed August 2015 Vantage Labs refinances the debt of SantoLubes. SantoLubes continues paying for the ongoing "pump and treat" at 8 Governor Dr., the Operating Units Capital Calls, and pays the real estate taxes on 8 Governor Drive. January 2020 Vantage terminates George E Garrison for cause and purchases Garrison's ownership in SantoLubes for \$2,100. Garrison suffers a \$1.7MM capital loss, goes on unemployment, and his only income is Social Security of \$4,000 a month for him and his wife.

2. Identify the state and date of incorporation, and agent for service for each identity identified in your response to Question 1.

Arch Technology Holdings Incorporated September 2003. Agent Polsinelli. November 2003, Findett Real Estate Inc. incorporated in Missouri. Agent Polsinelli. 2005 NRAI in Delaware became the registered agent for Findett Real Estate Inc. April 2009 Findett Real Estate Corporation LLC, was incorporated in Missouri. NRAI in Delaware was the Registered Agent. August 2015, Vantage Labs, which I believe is a Delaware LLC was formed. Vantage Labs, the parent, is a Pennsylvania Corporation. I do not know when it was incorporated or who is the agent for Vantage.

3. To the extent not addressed in response to Question 1, Describe the relationship between Respondent and the following entities: Findett Services Company, Findett Corporation, Findett Properties LLC, Findett LLC, Santolubes LLC, SantoLubes Manufacturing, LLC, Santovac Fluids, LLC, SantoTrac Traction Lubricants, The Harvest Group, Arch Technology Holding LLC, Sylvan Partners, and affiliated companies or entities of such entities.

Since Vantage/SantoLubes has all of my records, I will have to rely on memory.

The Stock of Findett Corporation was purchased by Arch Technology Holdings in November 2003. Arch Technology changed its name to SantoLubes in 2005. Findett Services Corporation I believe was an entity Mr. Joaquim formed to manage the environmental liabilities of 8 Governor.

Findett Corporation had three subsidiaries, which Arch continued for a time: Santovac Fluids, SantoTrac Traction Lubricants, and Synergy. George Garrison was the sole owner of The Harvest Group, a New Jersey S Corporation founded in May 1992. The Harvest Group focused on Mergers and Acquisitions in the Chemical Industry. Harvest originated the transaction with Mr. Joaquim; however, to acquire Findett, Garrison formed Sylvan Partners. Garrison owned 70% of Sylvan and was the Managing Member. Sylvan had three other partners.

4. Provide all purchase and sale agreements between Respondent and the entities identified in your responses to Questions 1 and 3 above including, but not limited to, mergers agreements, acquisitions, asset purchases, shareholder agreements, membership agreements, or other Respondence governance agreements.

I have none of these documents. They were SantoLubes corporate documents and were retained by SantoLubes with no copies for me.

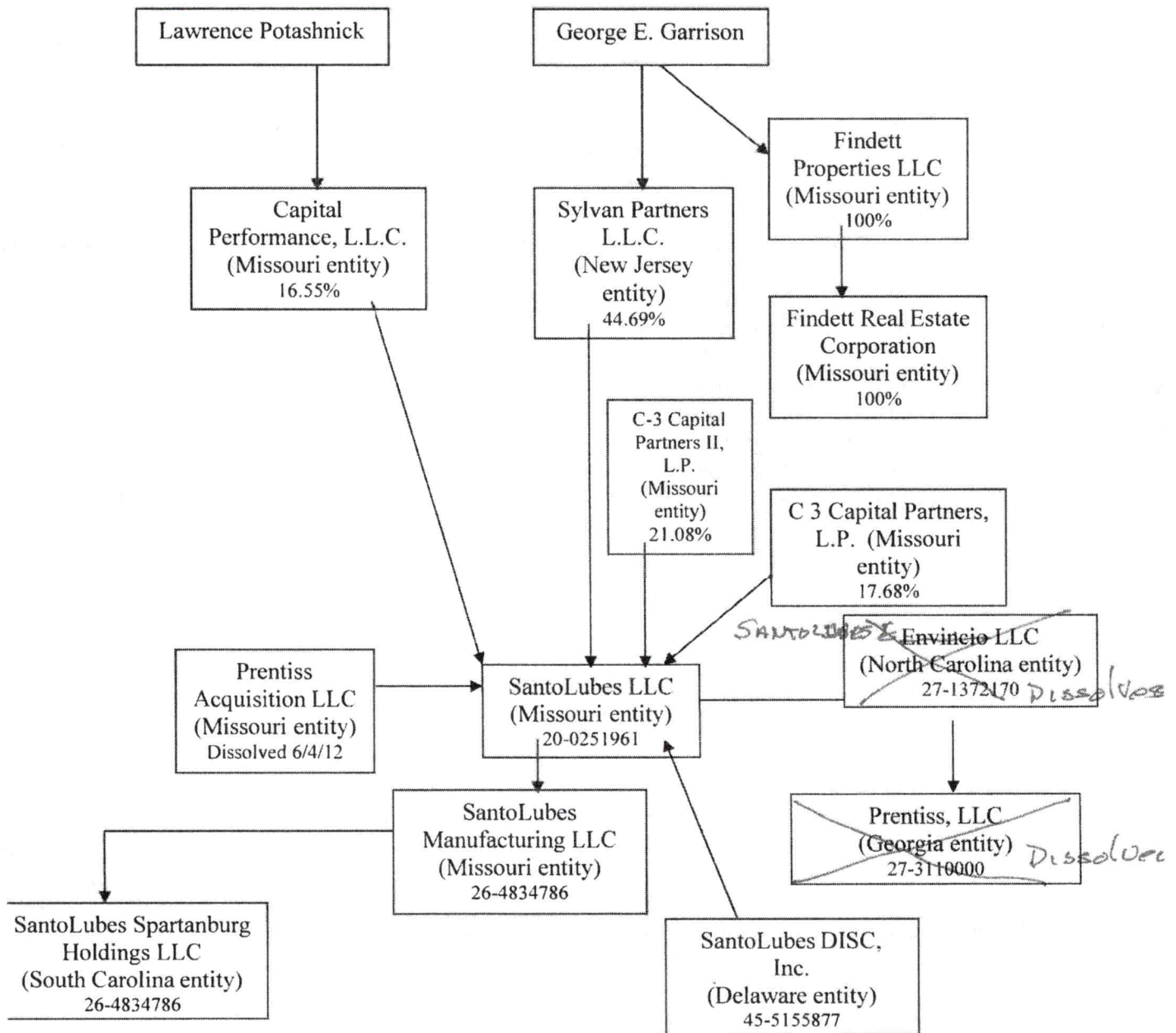
5. Provide all current and former Respondent membership agreement, operating agreements, or other Respondent governance agreements. See my answer to 4 above.
6. State the name(s), address(es), roles or positions, and periods of employment or ownership of all current and past executives and/or owners of Respondent including, but not limited to, the

President, Chief Executive Officer, Vice President, Secretary, Treasurer, Manager and any member, shareholders, or partners.

George E Garrison was President and Chief Executive Officer of Arch Technology/SantoLubes from November 2003 to January 31, 2020. Larry Potashnick was Treasurer of Arch/Santolubes from November 2003 to August 24, 2015. Alan Witte of Posinelli was Secretary of Arch/SantoLubes originally, but Alan resigned as Secretary and I don't remember who replaced him. George Garrison was also the Managing Member or Manager of Arch/SantoLubes from November 2003 to January 31, 2020. The Members of Arch/Santolubes from November 2003 to August 24, 2015 were Sylvan Partner (controlling Member George Garrison), Capital Performance LLC (Larry Potashnick), and C3 Capital (a Missouri LP). After August 24, 2015 the Members were Sylvan (40%), Thomas Reginald Forbus (6%), and Vantage Labs (54%). Shown below is a Flow Chart of Entities developed by Polsinelli for SantoLubes on July 24, 2013.

FLOW CHART OF ENTITIES

As of July 24, 2013



7. If there was a change in membership or control of Respondent, or Respondent was acquired by another company or entity, describe the nature the change in membership control, or acquisition, how it occurred, and who is now responsible for Respondent's prior and current liabilities. Provide all documents related to such change in membership control, or acquisition. Arch/SantoLubes was owned by Sylvan, Capital Performance, and C3 Capital from November 2003 to August 24, 2015. On August 24, 2015, Vantage Labs provided debt to SantoLubes to buyout Capital Performance and C3 Capital. Forbus was gifted 6% of the shares of SantoLubes, Sylvan was diluted to 40% ownership and Vantage received the remaining 54%. All documents related to the transactions were retained by SantoLubes and Vantage Labs.
8. Provide all deeds ad ownership or lease agreements regarding this site. SantoLubes and Vantage retained all such deeds and documents.
9. Identify all persons, companies, or entities that currently or previously held non-ownership financial interest in Respondent and describe the nature of such financial interest. I can't think of any.
10. Provide all documents relating to Respondent's assumption, performance, delegation, or assignment of responsibilities under the May 14, 1990 Consent Decree entered between Findett Corporation and te United States (Civil Action#90-0417-C-6) for the implementation of remedial action at the site.

In November 2003 when we purchased the shares of Findett Corporation, I assumed the performance required under the Consent Decree. Mr. Joaquim assumed responsibility for the removal of PCB contaminated soil on the site and the soil was eventually removed. The rent from Arch/Santolubes allowed me to fund the ongoing "pump and treat." Eventually I no longer had the money to fund all the activities associated with the Consent Decree and Arch/SantoLubes began to pay those expenses.
11. Describe Respondent's, or any subsidiaries or affiliates of Respondent's, involvement in operating and maintaining the pump and treat system at the Site and/or addressing contamination at the Site. State how long Respondent or any subsidiaries or affiliates has been involved in operating and maintaining such pump and treat system and/or addressing contamination at the Site. Describe and identify whether there have been times during such operation and maintenance of the pump and treat system when the system was not operating and describe Respondent's or its subsidiaries' or affiliates' involvement in performing or directing maintenance and repair to keep the system operating.

I worked on the Site from November 2003 to October 2009 and was intimately involved with the pump and treat system. In June 2008, the Site was flooded and it was November, I believe, before we had it up and running again. In April 2009, we had an explosion and fire, which shut

down the System. I think we had the System running again by August 2009. In October 2009, we moved the headquarters and manufacturing of SantoLubes to Spartanburg, SC. We left one man on the Site, Steve Burian, whose main job was to maintain and operate the System and deal with other environmental issues at 8 Governor. SantoLubes paid Steve and paid for all repairs, new wells, and other costs. The Site was flooded in June 2019 and the System was down for a few months. The System has been down a few times because of freezing temperatures. Steve Burian has notified the EPA every time the System was shut down. I don't know what has happened since January 2020.